

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (KBO)

(Jointly Administered)

Ref. No. 30629

CERTIFICATION OF COUNSEL

I, Matthew R. Pierce, counsel to the FTX Recovery Trust,² hereby certify as follows to the best of my knowledge, information and belief:

1. On June 4, 2025, the FTX Recovery Trust filed the *Motion of the FTX Recovery Trust and the Separate Subsidiaries for Entry of a Final Decree (I) Closing the Chapter 11 Cases of the Consolidated Debtors and (II) Closing the Chapter 11 Cases of the Separate Subsidiaries on the Applicable Closing Date* [D.I. 30629] (the “Motion”) with the United States Bankruptcy Court for the District of Delaware (the “Court”). A proposed form of final decree (the “Proposed Final Decree”) was attached to the Motion as Exhibit A.

2. Pursuant to the notice attached to the Motion, the deadline to respond to the Motion was June 18, 2025 at 4:00 p.m. (ET) (the “Response Deadline”). Prior to the Response Deadline, the FTX Recovery Trust received informal comments to the Proposed Final Decree from the Office of the United States Trustee for the District of Delaware (the “U.S. Trustee”). As of the date

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² The FTX Recovery Trust (a/k/a the Consolidated Wind Down Trust) was established on January 3, 2025, the effective date of the Debtors’ confirmed *Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Debtor Affiliates* [D.I. 26404-1] (the “Plan”).

hereof, no other formal or informal responses or objections to the Motion have been filed or served on the FTX Recovery Trust.

3. To resolve the informal comments from the U.S. Trustee, the FTX Recovery Trust has revised the Proposed Final Decree, a copy of which is attached hereto as **Exhibit 1** (the “**Revised Proposed Final Decree**”). A copy of the Revised Proposed Final Decree compared against the Proposed Final Decree is attached hereto as **Exhibit 2**. In accordance with the Court’s electronic order processing procedures, a clean copy of the Revised Proposed Final Decree shall be uploaded to CM/ECF.

4. A copy of the Revised Proposed Final Decree was provided to the U.S. Trustee, who has advised that the U.S. Trustee does not object to entry of the Revised Proposed Final Decree.

5. Accordingly, the FTX Recovery Trust respectfully requests that the Court enter the Revised Proposed Final Decree at its earliest convenience.

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Dated: June 20, 2025
Wilmington, Delaware

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/s/ Matthew R. Pierce

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